



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 11 2016

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Genevieve Walker
Director of Environmental Compliance
First Responder Network Authority
U.S. Department of Commerce
12201 Sunrise Valley Dr. M/S 243
Reston, VA 20192

Subject: Draft Programmatic Environmental Impact Statement on the Nationwide Public Safety Broadband Network for the Central United States, CEQ # 20160184

Dear Ms. Walker:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) has completed its review of the First Responder Network Authority (FirstNet), draft Programmatic Environmental Impact Statement (PEIS). The draft PEIS analyzes the impacts of the construction and operation of a nationwide public safety broadband network (NPSBN) in the Central United States.

The NPSBN will address a critical national infrastructure need for a nationwide network to allow law enforcement personnel, fire fighters, emergency medical service professionals, and other public safety entities to communicate across agencies and jurisdictions. The draft PEIS is the third in a series that covers five geographic regions across the U.S. This draft PEIS covers the central United States and includes the states of Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Montana, Nebraska, North Dakota, Ohio, South Dakota, Utah, Wisconsin, and Wyoming.

The draft PEIS analyzed three alternatives: 1) Proposed Alternative, 2) Deployable Technologies Only Alternative, and 3) No Action Alternative. FirstNet selected the Proposed Alternative as the Preferred Alternative. Under the Proposed Alternative, FirstNet would construct a nationwide broadband Long Term Evolution (LTE) network using a combination of wired, wireless, deployable, and satellite technologies. This may include, but is not limited to colocation of network equipment and new infrastructure.

Based on our review, EPA rates the Proposed Alternative an **LO**. The “LO” rating signifies that the draft PEIS review did not identify any potential environmental impacts requiring substantive changes to the Preferred Alternative.

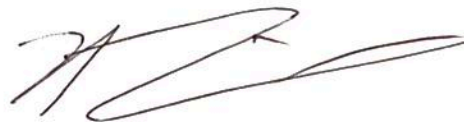
We offer a few comments regarding the Climate Change discussion. The PEIS references the Council on Environmental Quality’s 2014 Revised Draft *Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews* (GHG Guidance). CEQ finalized the GHG Guidance on August 1, 2016. The Final GHG Guidance eliminates the reference point of 25,000 metric tons of CO₂-e annually for determining whether quantification of a project’s GHG emissions is warranted. This reference point is used throughout the GHG and climate change analysis in the PEIS. We recommend referencing the 2016 Final GHG Guidance rather than the 2014 draft and revising the GHG and climate change analysis to remove the 25,000 metric tons of CO₂-e reference point and ensure overall consistency with the 2016 Final GHG Guidance.

Further, the PEIS states on page 57, under *ES-5.14 Climate Change*, “GHG emissions would be emitted locally but likely have a minimal effect globally.” FirstNet compares the proposal’s estimated GHG emissions to global and local GHG emission levels. As stated in the CEQ Final GHG Guidance, such comparisons are “not an appropriate method for characterizing the potential impacts associated with a proposed action and its alternatives and mitigations because this approach does not reveal anything beyond the nature of the climate change itself: the fact that diverse individual sources of emissions each make a relatively small addition to global atmospheric GHG concentrations that collectively have a large impact.”¹ EPA recommends that FirstNet follow the approach outlined by the CEQ’s Final Guidance regarding the analysis of greenhouse gas emissions and climate change and remove these inappropriate comparisons.

The EPA Rating System Criteria is located at <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

We appreciate the opportunity to review the draft PEIS and look forward to reviewing the final PEIS. The staff contact for the review is Arthur Totten at (202) 564-7164.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Rob Tomiak', with a long horizontal flourish extending to the right.

Rob Tomiak
Director
Office of Federal Activities

¹ CEQ Guidance, p.11.